

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| BYTEMARK, INC., | § | |
| | § | |
| Plaintiff, | § | |
| | § | |
| v. | § | CIVIL ACTION NO. 1:17-cv-01803 |
| | § | (PGG) |
| XEROX CORP., ACS TRANSPORT | § | ECF CASE |
| SOLUTIONS, INC., XEROX | § | |
| TRANSPORT SOLUTIONS, INC., | § | |
| CONDUENT INC., and NEW JERSEY | § | |
| TRANSIT CORP., | § | |
| | § | |
| Defendants. | § | |
| | § | |
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| | § | |
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XEROX AND CONDUENT'S MOTION FOR LEAVE TO FILE UNDER SEAL

Defendants Xerox Corp., ACS Transport Solutions, Inc., Xerox Transport Solutions, Inc. (collectively, “Xerox”) and Conduent Inc. (“Conduent”) request leave to file under seal Exhibit 3 in support of Xerox and Conduent’s Response in Opposition to Third-Party Jennifer Meredith’s Motion to Quash Defendants’ Subpoena and for a Protective Order. That exhibit, reflecting the invalidity contentions of Masabi during separate litigation, was produced by Plaintiff Bytemark, Inc., during this litigation and Bytemark designated it Confidential under the Protective Order. Xerox and Conduent thus seek leave to file Exhibit 3 under seal to comply with their obligations under the Protective Order. Pursuant to Your Honor’s Individual Rule II(B), Xerox and Conduent hereby provide notice to Bytemark that “it must file, within three days, a letter explaining the need to seal or redact [exhibit 3].”

Dated: July 12, 2022

Respectfully submitted,

/s/ Ashley N. Moore

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Attorneys for Defendants

CERTIFICATE OF SERVICE

This is to certify that all known counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on this 12th day of July, 2022. Any other known counsel of record will be served with a copy of this document by e-mail and/or facsimile transmission.

By: */s/ Jonathan Powers*
Jonathan Powers